

Exhibit A

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF SPARTANBURG)	C. A. No.: 2021-CP-42- _____
Virginia Ann James,)	
)	
Plaintiff)	SUMMONS
vs.)	(JURY TRIAL)
BI-LO, LLC,)	
)	
Defendant.)	

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is attached herewith served upon you, and to serve a copy of your answer to said Complaint on the subscribers at their office at Post Office Box 2765, 229 Magnolia Street, Spartanburg, South Carolina, 29304, within thirty (30) days after such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in this Complaint.

HODGE & LANGLEY LAW FIRM, P.C.

Attorney for Plaintiff

By: s/Charles J. Hodge
Charles J. Hodge
Post Office Box 2765
Spartanburg, SC 29304
Office: (864) 585-3873
Fax: (864) 585-6485

April 21, 2021
Spartanburg, SC

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF SPARTANBURG)	C. A. No.: 2021-CP-42- _____
Virginia Ann James,)	
)	
	Plaintiff)
vs.)	COMPLAINT
BI-LO, LLC,)	(JURY TRIAL)
)	
	Defendant.)

THE PLAINTIFF complaining of the Defendant would respectfully show unto the Court as follows:

GENERAL ALLEGATIONS

1. That the Plaintiff is a citizen and resident of the County of Spartanburg, State of South Carolina. That Defendant, BI-LO, LLC, at all times herein was a South Carolina corporation organized, existing and operating under the laws of the State of South Carolina in the grocery business.
2. That the Defendant BI-LO, LLC, at the time of the occurrence complained of was duly licensed to engage in the business of grocery sales and service in the State of South Carolina and did hold itself out to the public at large and to Plaintiff Virginia Ann James.
3. That on or about January 11, 2020, the Plaintiff, was inside of the Defendant's grocery store on S. Alabama Ave in Chesnee, SC. As Plaintiff was leaving, she proceeded through the automated doors with her shopping cart and the doors closed on her. This caused Plaintiff to fall on her left side onto her knee and hit her hand on the

shopping cart. This fall caused the Plaintiff to suffer serious injury.

4. That the injuries and damages sustained by the Plaintiff were due to and caused by and were the direct and proximate result of the negligent and/or reckless, willful, and wanton acts of the Defendant in that it failed to exercise that degree of care and safety ordinarily employed in similar circumstances by grocery stores who take care of similar invitees with similar circumstances. The Defendant knew or should have known of the dangerous condition and neither corrected nor warned the Plaintiff Virginia Ann James. The Defendant failed to use reasonable care and diligence and was negligent and/or reckless in one or more of the following particulars, to wit:

- (a) In failing to properly inspect the premises in order to keep it safe for invitees;
- (b) In failing to properly maintain its premises such that conditions which caused the Plaintiff's injuries would have been avoided;
- (c) In evidencing a complete disregard for the safety of the public in general and in particular, this Plaintiff; and
- (d) In failing to use that degree of care that an ordinary and prudent person would have used under the same or similar circumstances.

5. That as a direct and proximate result of the negligent and/or reckless, willful, and wanton acts of the Defendant, the Plaintiff, Virginia Ann James has suffered serious painful and personal injuries. That as a result of her injuries, the Plaintiff has been forced to undergo medical treatment and has incurred medical expenses. That as a result of the Plaintiff's injuries, she has been unable to engage in her normal pursuits of happiness, has suffered emotional distress, and mental anguish, all to his great damage.

WHEREFORE, the Plaintiff prays judgment against the Defendant as follows:

- (a) actual damages found to be fair and equitable within the discretion of the fact finder;
- (b) punitive damages if proven by clear and convincing evidence;
- (c) for the costs and disbursements of this action;
- (d) for prejudgment interest at the rate authorized by the South Carolina Supreme Court and S.C. Code Ann. § 34-31-20 (B); and,
- (e) for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

HODGE & LANGLEY LAW FIRM, P.C.
Attorney for Plaintiff

By: s/Charles J. Hodge
Charles J. Hodge
Post Office Box 2765
Spartanburg, SC 29304
Office: (864) 585-3873
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April 21, 2021
Spartanburg, SC

AFFIDAVIT OF SERVICE

State of South Carolina

County of Spartanburg

Common Pleas Court

Case Number: 2021-CP-42-01242

Plaintiff:
Virginia Ann James

vs.

Defendant:
Bi-Lo, LLC

For:
Charles Hodge
Hodge & Langley Law Firm, P.C.
229 Magnolia St.
Spartanburg, SC 29304

Received by Hodge & Langley Law Firm, P.C. to be served on Bi-Lo, LLC, 508 Meeting St., West Columbia, SC 29169.

I, Amanda Flint, being duly sworn, depose and say that on the 3rd day of May, 2021 at 11:51 am, I:

served a **CORPORATION** by delivering a true copy of the **Summons and Complaint** to: **Savannah Pope as Administrative Assistant for Corporation Service Company** on behalf of **Bi-Lo, LLC**, at the address of: **508 Meeting St., West Columbia, SC 29169**, and informed said person of the contents therein, in compliance with state statutes.

I certify that I am over the age of 18, have no interest in the above action, and am a Process Server in good standing in the judicial circuit in which the process was served.

Amanda Flint

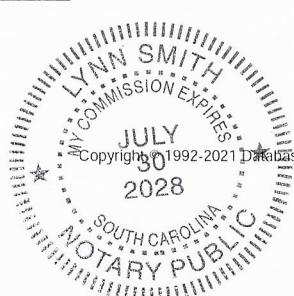
Amanda Flint
Process Server

Hodge & Langley Law Firm, P.C.
P.O. Box 2765
Spartanburg, SC 29304
(864) 585-3873

Our Job Serial Number: UPL-2021001066

Subscribed and Sworn to before me on the 3rd day of May, 2021
by the affiant who is personally known to me.

Lynn Smith
NOTARY PUBLIC



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